

1 Sheri M. Thome, Esq.  
Nevada Bar No. 008657  
2 James T. Tucker, Esq.  
Nevada Bar No. 012507  
3 Cara T. Laursen, Esq.  
Nevada Bar No. 014563  
4 WILSON, ELSE, MOSKOWITZ, EDELMAN & DICKER LLP  
300 South Fourth Street, 11th Floor  
5 Las Vegas, Nevada 89101  
Telephone: (702) 727-1400  
6 Facsimile: (702) 727-1401  
Sheri.Thome@wilsonelser.com  
7 James.Tucker@wilsonelser.com  
CaraT.Laursen@wilsonelser.com  
8 *Attorneys for Defendant The State of Nevada, Ex. Rel. Its  
Nevada Department of Corrections*

9  
10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 DONALD WALDEN JR., NATHAN  
13 ECHEVERRIA, AARON DICUS, BRENT  
EVERIST, TRAVIS ZUFELT, TIMOTHY  
14 RIDENOUR, and DANIEL TRACY on behalf  
of themselves and all others similarly situated,

15 Plaintiffs,

16 vs.

17 THE STATE OF NEVADA, EX REL. ITS  
NEVADA DEPARTMENT OF  
18 CORRECTION, and DOES 1-50,

19 Defendants.

Case No. 3:14-cv-00320-MMD-WGC

**STIPULATION AND ORDER TO EXTEND  
THE DEADLINE FOR (1) FILING  
DISPOSITIVE MOTIONS AND (2) FILING  
AN OPPOSITION BRIEF TO  
PLAINTIFFS' MOTION FOR PARTIAL  
SUMMARY JUDGMENT ON LIABILITY  
FOR UNPAID WAGES UNDER THE FLSA  
(FIRST REQUEST)**

20 Defendant, the State of Nevada, Ex. Rel. Its Nevada Department of Corrections ("NDOC"),  
21 and Plaintiffs Donald Walden Jr., Nathan Echeverria, Aaron Dicus, Brent Everist, Travis Zufelt,  
22 Timothy Ridenour, and Daniel Tracy, on behalf of themselves and all others similarly situated  
23 ("Plaintiffs"), by and through their respective counsel of record, hereby stipulate and agree to extend  
24 the dispositive motion deadline by thirty days, from March 2, 2020 to **April 1, 2020**.

25 The parties also stipulate and agree to extend the deadline for NDOC to file a response to  
26 Plaintiffs' Motion for Partial Summary Judgment on Liability for Unpaid Wages Under the FLSA  
27 ("Motion") by two weeks, from March 16, 2020 to **March 30, 2020**.

1 This stipulation is submitted in compliance with LR IA 6-1. Good cause exists for the  
2 requested extension as counsel for the NDOC experienced a Firm wide system crash which resulted  
3 in having no access to the document management system which holds all relevant file materials and  
4 information necessary to respond to Plaintiffs' Motion. Accordingly, the parties agree that the  
5 requested extension furthers the interest of this litigation and is not being requested in bad faith or  
6 to delay these proceedings unnecessarily.

7 This is the parties' first request for extension of these deadlines.

8 DATED this 26<sup>th</sup> day of February, 2020.

9 **WILSON, ELSER, MOSKOWITZ,**  
10 **EDELMAN & DICKER LLP**

11 */s/ James T. Tucker*

12 Sheri M. Thome, Esq., Nevada Bar No. 008657  
13 James T. Tucker, Esq., Nevada Bar No. 012507  
14 Cara T. Laursen, Esq., Nevada Bar No. 014563  
15 300 South Fourth Street, 11th Floor  
16 Las Vegas, Nevada 89101  
17 *Attorneys for Defendant*

18 DATED this 26<sup>th</sup> day of February, 2020.

19 **THIERMAN BUCK LLP**

20 */s/ Leah L. Jones*

21 Mark R. Thierman, Esq., Nevada Bar No. 8285  
22 Joshua D. Buck, Esq., Nevada Bar No. 12187  
23 Leah L. Jones, Esq., Nevada Bar No. 13161  
24 7287 Lakeside Drive  
25 Reno, Nevada 89511  
26 *Attorneys for Plaintiffs*

27 **ORDER**

28 **GOOD CAUSE SHOWN, IT IS SO ORDERED.**

Dated this 27<sup>th</sup> day of February 2020.



UNITED STATES DISTRICT JUDGE